

UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: STANLEY ARTHUR YOUNG, II a/k/a : CHAPTER 13
STANLEY YOUNG, II a/k/a STANLEY :
A. YOUNG a/k/a STANLEY ARTHUR :
YOUNG a/k/a STANLEY A. YOUNG, II :
Debtor :
: CASE NO. 5:21-bk-02538-MJC

TRUSTEE'S LIMITED OBJECTION
TO MOTION TO SELL REAL PROPERTY

AND NOW, this 23rd day of June, 2022, comes Jack N. Zaharopoulos, Standing Chapter 13 Trustee, by and through his attorney, Agatha R. McHale, and objects to Debtor's, motion, a statement of which follows

1. At filing, Debtor owned real property known as 1023 Mahoning Mtn. Rd., Lehighton, PA 18235 ("Property").
2. At filing, the Property was valued on Schedule A at \$147,500.00 pursuant to a Comparable Market Analysis provided by the Debtor.
3. On June 16, 2022, Debtor filed a Motion to Sell the Property for the sum of \$237,500.00.
4. The Motion alleges that the appreciation in value of the Property is not property of the bankruptcy estate because the Property vested at confirmation.
5. To the contrary, Trustee believes that the Property's increase in value is an asset of the bankruptcy estate, and therefore, avers that the net proceeds from the sale should be paid into Debtors' Chapter 13 Plan to the extent needed to pay Debtor's unsecured creditors in full.

WHEREFORE, Trustee requests this Honorable Court enter an Order that non-exempt proceeds derived from the sale of the Property be paid into the Chapter 13 Plan for the benefit of Debtor's unsecured creditors.

Respectfully submitted:

Jack N. Zaharopoulos
Standing Chapter 13 Trustee
8125 Adams Drive, Suite A
Hummelstown, PA 17036
(717) 566-6097

BY: /s/Agatha R. McHale

CERTIFICATE OF SERVICE

AND NOW, this 23rd day of June, 2020, I hereby certify that I have served the within Objection by electronically notifying parties or by depositing a true and correct copy of the same in the United States Mail at Harrisburg, Pennsylvania, postage prepaid, first class mail, addressed to the following:

Vincent Rubino, Esquire
712 Monroe Street
P.O. Box 511
Stroudsburg, PA 18360

/s/Deborah A. Behney
Office of Jack N. Zaharopoulos
Standing Chapter 13 Trustee